



Duval County Public Schools

DUCKET FILE COPY ORIGINAL

Received & Inspected

NOV 10 2008

FCC Mail Room

1701 Prudential Drive
Jacksonville, FL 32207

www.duvalschools.org
904 390 2000

October 29, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
44512th Street, SW
Washington, DC. 20554

RE: Request for Review per CC Docket No. 02-6
U.S.A.C. Administrator's Decision Letter on Appeal-Funding Year 2006-2007
USAC Invoice Number 939037

Dear Ms Dortch,

The purpose of this letter is to file a formal appeal, as outlined in CC Docket No. 02-6, with the FCC, regarding the denial outcome stated in the USAC/Schools and Libraries Administrator's Form 472 (BEAR) Notification letter dated October 13, 2008. (*See attached*)

We are requesting reconsideration of our Form 472 re-filing dated August 18, 2008 to the USAC/Schools and Libraries Division (attached) and reinstatement of E-Rate funding, by the USAC/SLD, in the amount of \$49,105.01. This amount was denied in USAC's October 16, 2008 Form 472 notification sent to our district. We opted to file this appeal with the FCC, since we have already been through the formal USAC appeals process and now were denied, for what we feel is an USAC error.

Our school District's E-Rate program management team has made good faith efforts to satisfy all USAC/SLD requirements with regard to our form filings to receive funding approvals and reimbursement. The attached documentation and timeline, indicates over 12 months of effort, by our District's E-rate staff, to get to a point where the USAC/SLD would accept the necessary reimbursement request for a single school location. Now, we are denied a payment because the USAC/SLD feels there was a duplicate invoicing of a line item. This is in error, per the attached invoice documentation.

We acknowledge the timeline and guideline requirements for USAC form filings and their outcomes. However, our April 21 2008 appeal, to the USAC Ombudsman group, was based on a clerical error with the Service Start Date on our Form 486 filing submitted June 2007.

This error was due in part to the inexperience of our E-rate program team, which was in a state of transition during the period from April through June 2007. We failed to recognize the incorrect service start date, at the time.

Ed Pratt-Dannals, Superintendent of Schools

*Duval County Public Schools is committed to providing all Duval County students with
A high-quality, rigorous education that will inspire them to dream and reach their goals.*





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During our Management team transition period, the *Service State Date* was entered based on the Service Provider invoice dates versus the service start date of July 1, 2006 listed on our Form 471.Funding Commitment Decision Letter, dated October 24, 2006.

Our new district E-Rate Management team did not discover the USAC Form 486 responses and Service Start Date change prior to our initial Form (BEAR) 472 filings.

As stated, the USAC/SLD Service Start Date change was a result of a School District clerical error from the time of the Form 486 filing in June 2007. Again, based on the inexperience of District's E-rate Program management team, at the time of the June 27, 2007 USAC notification. We did not recognize or discover Service Start Date error, until our October 11, 2007 Form 472 filing.

However, during the last 12 month period starting June 2007, there were many contacts with the USAC/SLD, as evidenced by the listed SLD Helpdesk case numbers, in efforts to resolve this issue.

During these last 12 months, the USAC/SLD has reviewed our vendor invoices, equipment ship dates, district purchase order dates, and other E-rate filing information regarding this school location and our funding requests. During this period of time, USAC/SLD helpdesk personnel and other USAC reviewers have had many opportunities to analyze all of the pertinent information relevant to our requests. All of these USAC/SLD reviews have resulted in many outcomes, other than the initial Service Start Date issue.

This continued analysis, by USAC, lead to the entire USAC review process slowing almost to a halt. In fact, when the USAC/SLD review process was at a stalemate, our school district's E-Rate program team found it necessary to invoke the services of the USAC Ombudsman group and the E-rate H.A.T.S. (*Helping Applicants to Succeed*) program, administered by BearingPoint. This invoking of Ombudsman services was necessary to get the review of our requests back on track. The bureaucracy of the USAC filing process has made it extremely difficult for our district to receive the re-imbursement monies approved in our F.C.D.L. dated October 24, 2006.

In summary, once you have reviewed all of the attached documentation, we feel you will conclude, as we have, the following.

- 1) Our District E-rate management Team does admit to a clerical error with the Service Start Dates in our initial Form 472 filings. We feel our error was not intentional, but based only on the inexperience of the new School District E-Rate team, at that time.
- 2) Our Initial appeal for the change of the Service Start Date should be reconsidered and allowed to be changed to July 1, 2006, since it had already been approved by USAC in the Funding Commitment Decision Letter.

Ed Pratt-Dannals, Superintendent of Schools

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- 3) Once the Service Start date is changed in accordance to our April 2008 appeal, our E-rate funding reimbursement for the USAC Funding Request (FRN) 1479747 should be re-instated, since has been pre-approved by USAC.
- 4) Our Form 472 filing did not duplicate an invoice as stated in the October 16, 2008 Form 72 Notification Letter send to our District thus our funding re-imbursement should be reinstated.

Your review and consideration of our appeal is greatly appreciated. We look forward to a positive outcome to our request.

Sincerely,

William M. (Mike) Kirkland

Supervisor-Telecommunications/E-rate Project Manager

Duval County Public School System

Office: 904-348-7151

Fax: 904-348-7125

office desktop fax: 904-858-3565

DCPS email: kirklandw@duvalschools.org

E-Rate Team: erate@duvalschools.org

Attachments:

- USAC Administrators Form (BEAR) 472 Notification Letter dated October 16, 2008
- DCPS April 21, 2008 Email Appeal request to USAC/SLD with supporting timeline
- DCPS email document to USAC reviewer associated with the attached October 16 documentation

Ed Pratt-Dannals, Superintendent of Schools

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Schools and Libraries Division

Form 472 (BEAR) Notification Letter

October 16, 2008

Portia Speight
The Presidio Corporation
7601 Ora Glen Dr
Suite 100
Greenbelt, MD 20770

Re: Invoice Number - as assigned by USAC: 939037
Service Provider Identification Number: 143015315
Reimbursement Form Number: DCPS IC PRESIDIO FY0607 REFILE
Billed Entity Number: 127591

MIKE KIRKLAND
DUVAL COUNTY SCHOOL DISTRICT
DCPS TEAM CENTER A
4019 BOULEVARD CENTER DR
JACKSONVILLE, FL 32207

Preferred Mode of Contact: E-mail at erate@dreamsbeginnere.org
Total Amount of Reimbursement Approved for Payment: \$0.00

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR to request reimbursement for any unpaid lines.

We recommend using the BEAR Online tool from the Apply Online area or Required Forms section of our website for additional submissions. If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

Pursuant to the Federal Communication Commission's (FCC) Second Report and Order and Further Notice of Proposed Rulemaking (FCC 03-101, released April 29, 2003), you must remit the amount shown as "Total Amount of Reimbursement Approved for Payment" above to your customer no later than 20 days after receipt of payment of the approved discounts from USAC. You also agreed not to tender or make use of the payment of the approved discounts issued by USAC to you prior to remitting the discount to your customer (See BEAR Form, Block 4, Service Provider Acknowledgment).

The USAC check should be mailed to the service provider named above within 20 days of the date of this letter.

The maximum remaining amount available for each Funding Request Number (ERN) listed on the Report will be the original commitment less the amount approved herein for reimbursement and less any earlier disbursements to your customer.

PLEASE NOTE: The type of invoice form (BEAR or SPI) for the funding year is established by the receipt and approval of the first invoice submitted for the ERN for the funding year. For example, if we successfully process a BEAR for an ERN, we will not approve a SPI for that same ERN at a later time.

Please see the Guide to Letter Reports posted on our website for an explanation of the items listed in the attached Report.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division
Universal Service Administrative Company

CC: DUVAL COUNTY SCHOOL DISTRICT

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 521703
Funding Request Number: 1479747
Funding Year 2006: 07/01/2006 - 06/30/2007
Contract Number: ITB-018-05/EM
Funding Commitment Decision: \$50320.01
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
Duplicate invoicing of line item;

See MAIL COPY
DATE 10/07/08 TO
STEVEN HANDLER
INVOICE COPIES VERIFY
USAC ERROK

USAC

Schools and Libraries Division
Correspondence Unit
100 South Jefferson Road
P.O. Box 902
Whippany, NJ 07981

TIME SENSITIVE MATERIAL

00099
MIKE KIRKLAND
DUVAL COUNTY SCHOOL DISTRICT
DCPS TEAM CENTER A
4019 BOULEVARD CENTER DR
JACKSONVILLE, FL 32207

FUNDING COMMITMENT REPORT
Billed Entity Name: DUVAL COUNTY SCHOOL DISTRICT
BEN: 127591
Funding Year: 2006

Form 471 Application Number: 521703
Funding Request Number: 1479747
Funding Status: Funded
Category of Service: Internal Connections
Form 470 Application Number: 406840000507446
SPIN: 143015315
Service Provider Name: The Presidio Corporation
Contract Number: ITB-018-05/EM
Billing Account Number: SAP VENDOR 10440
Service Start Date: 07/01/2006
Contract Expiration Date: 06/30/2007
Site Identifier: 35143
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$55,911.12
Pre-discount Amount: \$55,911.12
Discount Percentage Approved by the USAC: 90%
Funding Commitment Decision: \$50,320.01 - FRN approved as submitted

FCDL Date: 10/24/2006

Wave Number: 027

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2006

Kirkland, William M.

From: Kirkland, William M.
Sent: Tuesday, October 07, 2008 11:26 AM
To: 'Handler, Steven'
Cc: Geiger, Donald G.
Subject: USAC Invoice 939037 fax dated October 06, 2008

Importance: High

Attachments: FRN 1479747 PIA request of 10-06-08.pdf; FRN 1470747 Invoice 939037 documents.pdf

Steven,
I hope your day is going well thus far.
I received your attached fax yesterday afternoon. The following is our response.



FRN 1479747 PIA
request of 10-...

=====

Our response:

You are correct the \$1,350.00 was paid at 90% for \$1,215.00 on a BEAR form dated 04/09/08. (see the attached PDF) This leaves a balance of \$49,105.01 based on the FCDL approval for \$50,320.01 dated 10/24/06. However, due to clerical error on the part of our District's Erate Team, there was a digit transposition in our 08/18/08 BEAR filing which listed \$49,015.01.

Since the error is on our School District's part, we are willing to accept the lower amount of \$49,015.01 as re-imbursement in lieu of the \$49,105.01.



FRN 1470747
nvoice 939037 doc..

Let me know if you need additional information..

William M. (Mike) Kirkland

William M. (Mike) Kirkland
Supervisor-Telecommunications
Duval County Public School System
Office: 904-348-7151

Fax: 904-348-7125 or 348- 7736

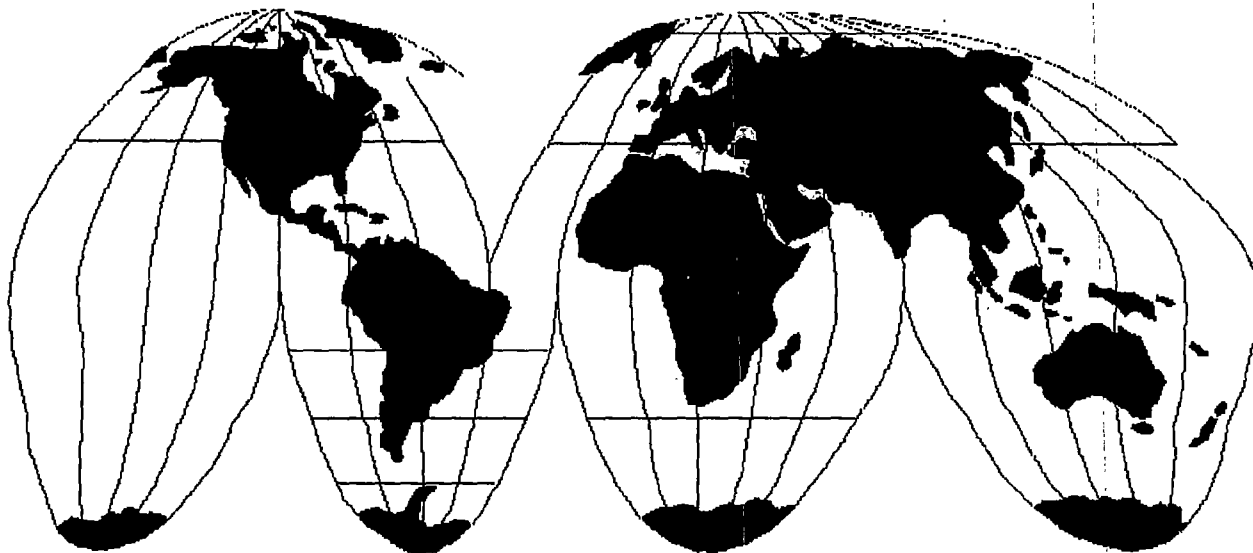
office desktop fax: 904-858-3565

Mobile service: 904-962-7882

DCPS email: kirklandw@duvalschools.org

FACSys[®] Fax Messaging Gateway

Fax enable your world with FACSys[®]



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www.facsys.com

To: Willima M. Kirkland

From: Handler, Steven

Fax Number: 1-904-348-7125

Subject: Invoice 939037 follow-up information

Date: October 06, 2008

Pages: 2

Time: 4:03:38 PM

Note:

Mike,

It appears that the invoice for \$1,350.00 has already been paid on a previous invoice. That invoice number was **869236**.

If this is true, please respond to my email that this invoice is indeed a duplicate and should be rejected for reimbursement. If it is not a duplicate, please provide both bills showing different pieces of equipment and different invoices..

Please provide this information within the next 2 days or by the close of business on Wednesday, October 8, 2008.

Thanks

Steve

Steven Handler

Post Commitment Operations

Schools and Libraries Division

100 South Jefferson Road PO Box 902

Whippany, NJ 07981



Email: shandle@sl.universalservice.org



Voice: (973) 581-5170



Fax: (973) 599-6572

WIRE OR ACH PAYMENTS:

PRESIDIO

PNC BANK

ACCT: 8611678714

NETWORKED SOLUTIONS

ACH ROUTING # 031000053

7601 ORA GLEN DR, SUITE 100

FEDERAL ID # 58-1667655

GREENBELT, MD 20770

301-313-2000 PHONE

301-313-2400 FAX

510 5682973

SOLD TO:

DUVAL COUNTY PUBLIC SCHOOLS
 ACCOUNTS PAYABLE
 1701 PRUDENTIAL DR. 2ND FLOOR
 JACKSONVILLE, FL. 32207

PAYMENTS MAY ALSO BE REMITTED TO:

PRESIDIO NETWORKED SOLUTIONS

PO BOX 822169

PHILADELPHIA, PA 19182-2169

5100 507671

PAGE NO.	INVOICE NO.	APPLY TO	INVOICE DATE	CUST. NO.
1	PS38854		6/20/2007	DCP01
INVOICE			WORK ORDER NO. PS38854	B.O.

FEN 1479747

SHIP TO:

DUVAL COUNTY PUBLIC SCHOOLS
 HIGHLANDS ELEM LOC 3099
 1000 DEPAUL ROAD
 JACKSONVILLE, FL. 32218-5499

DATE SHIPPED	PURCHASE ORDER NO	SHIP VIA	F.O.B.	TERMS
6/20/2007	4507017323	PRESIDIO SERVICES		DUE UPON RECEIPT
	DATE REQUESTED	LOCATION	SALES PERSON GABRIEL STIX	

10 BAYSTACK 1 PASSPORT

1

0

1

\$ 1,350.00

\$ 1,350.00

Response date to Steven Kandler
 10/6/08
 work

\$ 1,215.00 WAS PAID 4/09/2008

1,350.00
 X 90%
 = 1,215.00

FCDL
 (A) originally approved for \$50,320.01

(B) PAID 04/09/08 — \$ 1,215.00

(C) Amount Left for Re-Imbursement \$49,105.01
 ADJUSTED AMOUNT DUE AFTER PARTIAL PAYMENT

(D) 08/18/08 BEAR 472 \$ 49,015.01
 Filed for

*CLERICAL ERROR IN THE FILING AMOUNT BY OUR
 DISTRICT- WE WILL ACCEPT THE REDUCED AMOUNT
 ERROR WAS DUE TO TRANSPONSTION-

WILLIAM KIRKLANI

A finance charge of 1.5% per month (18% per annum) will be charged on unpaid balances.

No return merchandise accepted without prior Return Authorization. Returns are subject to a 15% restocking fee.

SUB TOTAL	PREPARED BY	INVOICE NUMBER	
\$ 1,350.00	DEBI PANIZARI	PS38854	\$ 1,350.00
			PLEASE REMIT THIS AMOUNT

CUSTOMER COPY

The
PRESIDIO Corporation

7601 ORA GLEN DR., SUITE 100 • GREENBELT, MD 20770
301-313-2000 • 1-800-452-6926 • FAX (301) 313-2400

PLEASE REMIT PAYMENTS TO:

Wire or ACH Payments:
PNC Bank
Acct: 8611678714
ACH ABA 031000053

By Mail:
The Presidio Corporation
PO Box 822169
Philadelphia, PA 19182-2169

PAGE NO. 1	INVOICE NO. 68059	APPLY TO	INVOICE DATE 01/29/07	CUST NO. DCP01
INVOICE			WORK ORDER NO. 38854	B.O. C

SOLD TO

DUVAL COUNTY PUBLIC SCHOOLS
PO#4507017323
ACCOUNTS PAYABLE
1701 PRUDENTIAL DR., 2ND FLOOR
JACKSONVILLE, FL 32207

SHIP TO

DUVAL COUNTY PUBLIC SCHOOLS
PO# 4507017323
HIGHLANDS ELEM. LOC. 3099
1000 DEPAUL ROAD
JACKSONVILLE, FL 32218-5499

10440

FRN 1479747

DATE SHIPPED	PURCHASE ORDER NO.	SHIP VIA	F.O.B.	TERMS		
01/29/07	4507017323	GROUND		DUE UPON RECEIPT		
DATE REQUESTED	LOCATION	SALESPERSON				
01/18/07		GABRIEL STIX				
ITEM NO.	DESCRIPTION	QUANTITY ORDERED	QUANTITY BACK ORD.	QUANTITY SHIPPED	UNIT PRICE	EXTENSION
DS1412E06	PASSPORT 8603 35LOT CHASSIS	1	0	1	13,115.90	13,115.90
DS1404011	PP 86165XE RTNG SW MOD 16PT 5X	1	0	1	13,247.35	13,247.35
DS1404056	PP 8648TXM RTG SW MODULE 48 PQ	1	0	1	10,067.35	10,067.35
DS1405E03	8003 ACPS VAC POWER SUPPLY	1	0	1	792.35	792.35
AL2012E34	BAYSTACK 470-48T SWITCH	4	0	4	2,382.35	9,529.40
AA1419001	1000BASE SX GBIC MODULE	6	0	6	182.85	1,097.10
AL2012E37	BAYSTACK 470-24T SWITCH	5	0	5	1,322.35	6,611.75
SMC6709GL2	TIGERSWITCH 8PORT 10/100 MANAG	2	0	2	345.00	690.00
FD-ST5C-50MIC-2M	2M MM DUPLEX 50 MICRON ST-5C	8	0	8	15.00	120.00
FD-SCMTRJ-50MIC-2	50 MICRON 2M 5C X MTRJ	8	0	8	15.85	126.80

2/17 Email
Celeste Smith

PAID

Separate invoice
for faxed invoice

2007 FEB -2 PM 3:18
FAXED

A finance charge of 1.5% per month (18% per annum) will be charged on unpaid balances.
No return merchandise accepted without prior Return Authorization. Returns are subject to a 15% restocking fee.

SUBTOTAL TAX

55,398.00 0.00

INVOICE NO.

55,398.00
PLEASE REMIT
THIS AMOUNT

CUSTOMER COPY

68059

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 521893
Funding Request Number: 1484230
Funding Year 2006: 07/01/2006 - 06/30/2007
Contract Number: ITB-018-05/EM
Funding Commitment Decision: \$43155.68
Reimbursement Amount for this FRN: \$42922.11
Reimbursement Request Decision Explanation:
Amount Requested Not Supported by Bill(s);

Form 471 Application Number: 521853
Funding Request Number: 1483512
Funding Year 2006: 07/01/2006 - 06/30/2007
Contract Number: ITB-018-05/EM
Funding Commitment Decision: \$40848.26
Reimbursement Amount for this FRN: \$40848.26

Form 471 Application Number: 521876
Funding Request Number: 1483921
Funding Year 2006: 07/01/2006 - 06/30/2007
Contract Number: ITB-018-05/EM
Funding Commitment Decision: \$33487.65
Reimbursement Amount for this FRN: \$33487.65

Form 471 Application Number: 521782
Funding Request Number: 1482218
Funding Year 2006: 07/01/2006 - 06/30/2007
Contract Number: ITB-018-05/EM
Funding Commitment Decision: \$46312.79
Reimbursement Amount for this FRN: \$46312.79

Form 471 Application Number: 521703
Funding Request Number: 1479747
Funding Year 2006: 07/01/2006 - 06/30/2007
Contract Number: ITB-018-05/EM
Funding Commitment Decision: \$50320.01
Reimbursement Amount for this FRN: \$1215.00
Reimbursement Request Decision Explanation:

AMOUNT PAID FROM DNR
SERVICE PROVIDER INVOICE

Do not write in this space.

Approval by OMB
3060 - 0856

Estimated time per response: 1.5 hours

Universal Service for Schools and Libraries

Please read instructions before completing.

(To be completed by schools, libraries, or consortia.)

BILLED ENTITY APPLICANT REIMBURSEMENT FORM

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Only one Service Provider Identification Number (SPIN) per form.

Must be completed and signed by the Billed Entity Applicant and signed by the relevant service provider.

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PER, Paperwork Reduction Act Project (3060-0856), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0856.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

BLOCK 1: HEADER INFORMATION

1. 471 Billed Entity Name	DUVAL COUNTY SCHOOL DISTRICT
2. 471 Billed Entity Number	127591
3. Service Provider Identification Number (SPIN)	143015315
4. Contact Name	WILLIAM M.(MIKE) KIRKLAND
5. Contact Telephone Number	904-348-7151
6. Reimbursement Form Number	DCPS IC Presisdio FY0607 refile
7. Reimbursement Date to USAC	08/18/2008
8. Total Reimbursement Amount (total of Block 2; Item 15 - 14.2 digits maximum)	\$49,015.01

Billed Entity Applicant Reimbursement Form

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

471 Billed Entity Name DUVAL COUNTY SCHOOL DISTRICT 471 Billed Entity Number 127591

Contact Name WILLIAM M.(MIKE) KIRKLAND Contact Telephone Number 904-348-7151

Reimbursement Form Number DCPS Ic Presidio FY0608 ReFile

BLOCK 2: LINE ITEM INFORMATION PER FUNDING REQUEST NUMBER

	(9) FCC Form 471 Application Number (10 digits) (from Funding Commitment Decision Letter)	(10) Funding Request Number (FRN) (10 digits) (from Funding Commitment Decision Letter)	(11) Bill Frequency	(12) Customer Billed Date (mm/yyyy)	(13) Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	(14) Total (Undiscounted) Amount for Service (14.2 digits max.)	(15) Discount Amount Billed to USAC (14.2 digits max.)
			DO NOT WRITE IN THIS COLUMN.	For each FRN, complete either Column (12) or Column (13), but not both Columns		14.2 digits allows for dollars and cents	
1	521703	1479747			02/07/2007	\$55,901.12	\$49,015.01
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM (8)							

BILLED ENTITY APPLICANT Reimbursement Form471 Billed Entity Name DUVAL COUNTY SCHOOL DISTRICT471 Billed Entity Number 127591Contact Name WILLIAM M.(MIKE) KIRKLANDReimbursement Form Number DCPS IC Presisdio FY0607 - Re file**Block 3: Billed Entity Certification**

I certify that I am authorized to submit this Billed Entity Applicant Reimbursement Form on behalf of the eligible schools, libraries, or consortia of those entities represented on this Form, and certify to the best of my knowledge, information and belief, as follows:

- A. The discount amounts listed in Column (15) of this Billed Entity Applicant Reimbursement Form represent charges for eligible services delivered to and used by eligible schools, libraries, or consortia of those entities for educational purposes, on or after the service start date reported on the associated Form 486.
- B. The discount amounts listed in Column (15) of this Billed Entity Applicant Reimbursement Form were already billed by the service provider and paid by the Billed Entity Applicant on behalf of eligible schools, libraries, and consortia of those entities.
- C. The discount amounts listed in Column (15) of this Billed Entity Applicant Reimbursement Form are for eligible services approved by the fund administrator pursuant to a Form 471 Funding Commitment Decision Letter.
- D. I recognize that I may be audited pursuant to this application and will retain for five years any and all records that I rely upon to fill in this form.

16. Signature of authorized person



17. Date

08/18/2008

18. Printed name of authorized person

WILLIAM M.(MIKE) KIRKLAND

19. Title or position of authorized person


SUPERVISOR-TELECOMMUNICATIONS

20. Telephone number of authorized person

9043487151

21. Address of authorized person

DCSB TEAM CENTER A, 4019 BOULEVARD CENTER DRIVE, JACKSONVILLE, FLORIDA 32207

BILLED ENTITY APPLICANT Reimbursement Form	
471 Billed Entity Name <u>DUVAL COUNTY SCHOOL DISTRICT</u>	
471 Billed Entity Number <u>12759</u>	
Contact Name <u>WILLIAM M. (MIKE) KIKRLAND</u>	
Reimbursement Form Number <u>CPS IC Presidio FY 06-07 Regle</u>	
Block 4: Service Provider Acknowledgment	
I certify that I am authorized to submit this Service Provider Acknowledgment for this Billed Entity Applicant Reimbursement Form, and acknowledge to the best of my knowledge, information and belief, as follows:	
A. The service provider must remit the discount amount authorized by the fund administrator to the Billed Entity Applicant who prepared and submitted this Billed Entity Applicant Reimbursement Form as soon as possible after the fund administrator's notification to the service provider of the amount of the approved discounts on this Billed Entity Applicant Reimbursement Form, but in no event later than 20 business days after receipt of the reimbursement payment from the fund administrator, subject to the restriction set forth in B below.	
B. The service provider must remit payment of the approved discount amount to the Billed Entity Applicant prior to tendering or making use of the payment issued by the Universal Service Administrative Company to the service provider of the approved discount for the Billed Entity Applicant Reimbursement Form.	
22. Signature of authorized person (fax, copy or original signature)	23. Date
	<u>5/17/08</u>
24. Printed name of authorized person	
<u>Portia Wright</u>	
25. Title or position of authorized person	
<u>Inside Sales Manager</u>	
26. Telephone number of authorized person	
<u>301-313-2028</u>	
27. Address of authorized person	
<u>7601 Via Glen Dr Greenbelt, Md 20772</u>	

A paper copy of this Form (pages 1-4) should be mailed to:

SLD BEAR Form
P. O. Box 1026
Lawrence, KS 66044-7026

If sent by express delivery services or U.S. Postal Service, Return Receipt Requested, the form (pages 1-4) should be mailed to:

SLD Form:
ATTN: SLD BEAR Form 472
3833 Greenway Drive
Lawrence, KS 66046
Phone: 1-888-203-8100

Kirkland, William M.

From: Kirkland, William M.
Sent: Friday, September 05, 2008 8:40 AM
To: 'shandle@sl.universalservice.org'
Subject: Duval County School Distict-- SLD Invoice # 939037--FRN 1479747 472-- review date 091508

SECOND USAC
Reviewer

Attachments: SLD Invoice # 939037 FRn 1479747 472 review 091508.pdf

FIRST USAC Reviewer
WAS WARREN
NUSS

Steven,

Per your August 29th facsimile, I have attached the requested information for SLD Invoice 939037

The following information is as requested:
See attached the invoice copy

- A) Bill date Ship Date 01/29/07 *** (see 02/07/07 note on invoice)
- B) Service Provider Name: The Presidio Corporation
- C) Total Current Charge: \$56,748.00
- D) Bill-to Entity (Name and Address): Duval County Public Schools
- E) Description of Products/Service Delivered:
Premises Network Electronics to support internal District network communications and connection to the Internet

***The Service start date of 02/07/07
was developed from our internal purchasing
procedures as the goods receipt of merchandise
Date for Purchase Order Number 4507017323
and noted on the lower left hand corner of
the attached invoice copy.

Please let me know if you have any questions.

Have a great weekend!



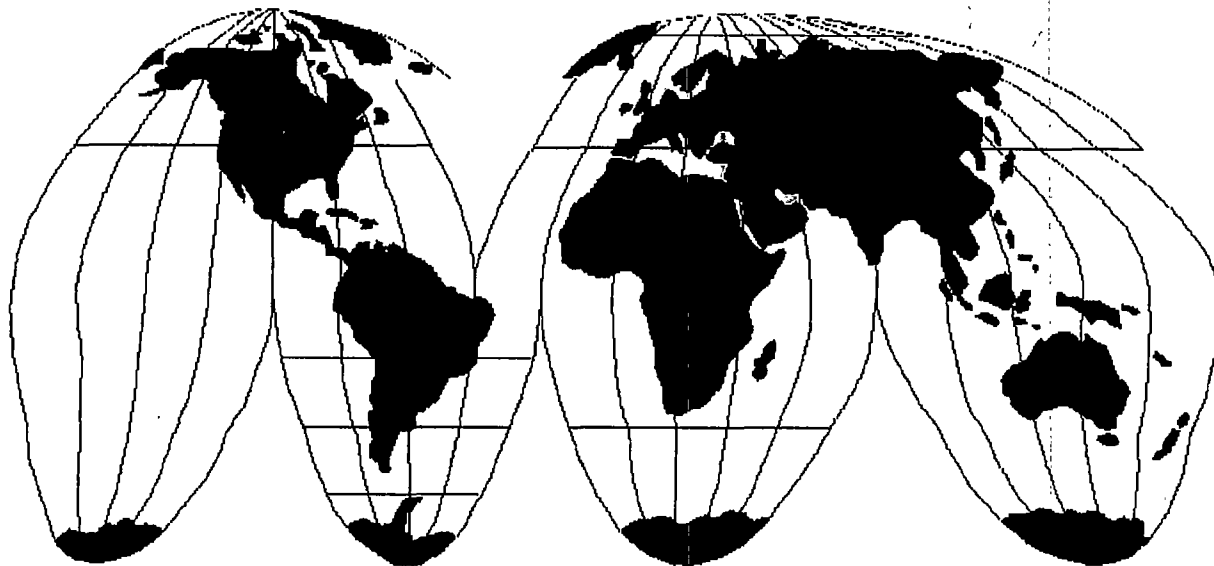
SLD Invoice #
939037 FRn 14797..

William M. (Mike) Kirkland

William M. (Mike) Kirkland
Supervisor-Telecommunications
Duval County Public School System
Office: 904-348-7151
Fax: 904-348-7125 or 348- 7736
office desktop fax: 904-858-3565
Mobile service: 904-962-7882
DCPS email: kirklandw@duvalschools.org

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www.facsys.com**

To: Willima M. Kirkland

From: Handler, Steven

Fax Number: 1-904-348-7125

Subject: Invoice 939037 for the Duval County

Date: August 29, 2008

Pages: 2

Time: 11:10:17 AM

Note:

Applicant Name: Duval County School District

Service Provider (SP) Name: The Presidio Corporation

Submitter Invoice Number: DCPS IC PRESIDIO FY060

SLD Invoice Number: 939037

471 Application Number: 521703

Funding Request Number (FRN): 1479747

Undiscounted Amount: \$55,901.12

Requested Amount: \$49,015.01

I am reviewing your request for reimbursement of the aforementioned FRN. Please send me a copy of the detailed invoices you received from the service provider for the products/services provided.

Please provide the page(s) that indicate the following:

- * Bill Date / Ship Date
- * Service Provider Name
- * Total Current Charge
- * Bill-To Entity (Name & Address)
- * Description of Products/Services Delivered

The applicant may fax/e-mail the above information to me directly, which may speed up the review process. Please put the SLD Invoice Number on the fax/e-mail cover sheet so I can match your fax/e-mail to your form.

Please provide this information to me as soon as possible within the next 7 calendar days by **End of Day, Friday, September 5, 2008**. Failure to do so may result in a reduction or rejection of the invoice, without further request. In this event, please ensure you have all necessary documents collected before resubmitting your request. If you have any questions, please contact me within this 7 day period.

Thank you for your cooperation and continued support of the Universal Service Program.

Steven Handler

Post Commitment Operations

Schools and Libraries Division

100 South Jefferson Road PO Box 902

Whippany, NJ 07981



Email: shandle@sl.universalservice.org



Voice: (973) 581-5170



Fax: (973) 599-6572



Universal Service Administrative Company

Schools & Libraries Division

Administrator's Decision on Invoice Deadline Extension Request

May 5, 2008

William M. Kirkland
Duval County School District
1701 Prudential Drive
Jacksonville, FL 32207-8152

471 Application Number: 521703
Funding Request Number(s): 1479747
Your Correspondence Dated: April 21, 2008

After thorough review and investigation of all relevant facts, the Universal Service Administrative Company (USAC) has made its decision in regard to your Invoice Deadline Extension request. This letter explains the basis of USAC's decision. If your request included more than one invoice number, please note that for each invoice for which an invoice deadline extension request was submitted, a separate letter is being sent.

Decision on Request: **Approved**

Since this Administrator's Decision approved your request, an invoice requesting payment must be submitted no later than 120 days after the date of this letter in order for your request to be considered as timely filed. If you are resubmitting a Form 472, please remember that you should forward the form to the Service Provider as soon as possible to ensure sufficient time to process your request. The invoice should be submitted in accordance with the instructions that are posted in the Forms area of the USAC/Schools and Libraries web site at www.usac.org/sl/ or are available by contacting the Client Service Bureau at 1-888-203-8100.

Thank you for your continued support of and participation in the E-rate program.

Schools and Libraries Division
Universal Service Administrative Company

See SLD Help Desk

CASE# 21-744447

DATED 5/14/08 → 8/14/08

MULTIPLE AGENT CASE

ENTRIES

Also see

USAC/SLD CASE#
21-753110



Schools & Libraries Division

Administrator's Decision on Invoice Appeal

May 5, 2008

William M. Kirkland
Duval County School District
1701 Prudential Drive
Jacksonville, FL 32207-8152

Re: SLD Invoice Number: 869236
SLD Invoice Line: 3210530
Vendor Invoice #: DCPS IC FY 06-07=Corrected
471 Application Number: 521703
Funding Request Number(s): 1479747
Correspondence Dated: April 21, 2008

After thorough review and investigation of all relevant facts, the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal. This letter explains the basis of USAC's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your letter of appeal included more than one SLD Invoice Number, please note that for each invoice for which an appeal is submitted, a separate letter is sent.

Funding Request Number(s): 1479747
Decision on Appeal: **Denied**
Explanation:

FRN 1479747 has a service start date of February 7, 2007. Therefore, the eligible period for which discounts may apply is February 7, 2007 to September 30, 2007. Information provided during invoice review indicated that services were delivered before the service start date. You did not demonstrate otherwise in your appeal. Therefore, your appeal is denied.

However, based on your appeal and the information provided, another opportunity to submit a Form 472 to USAC may be possible if an Invoice Deadline Extension is approved. An Invoice Deadline Extension Request will be filed on your behalf for FRN 1479747. You should receive a decision on this request shortly, and if approved, will have 120 days from the date of the decision letter to submit an invoice for

Kirkland, William M.

From: Kirkland, William M.
Sent: Monday, April 21, 2008 1:34 PM
To: 'appeals@sl.universalservice.org'; 'ombudsman@usac.org'; 'Paul Stankus'
Cc: Geiger, Donald G.; Maureen P. Githens (Maureen.Githens@fldoe.org);
pspeight@presidio.com
Subject: Letter of Appeal---Duval County School Board District-- USAC Invoice 869236 --FRN 1479747

Importance: High
Sensitivity: Confidential

Attachments: May 23 2006 FCDL.pdf; Oct 24 2006 FCDL approval.pdf; June 6 2006 Form 486 filing.pdf; USAC Form 486 Notification letter.pdf; FORM 472 filing-OCT 11 2007.pdf; Form 472 Nov 16 2007 USAC LTR.pdf; Form 500 Dec.19, 2007.pdf; Form 500 USAC Jan 10, 2008notice.pdf; FORM 472 filing-Jan.25 2008.pdf; Invoice deadline ext ltr. Feb.13, 2008.pdf; Form 472 filing march 6 2008.pdf; March 25 2008 response to USAC reviewer.pdf; March 25 2008 response to USAC reviewer.pdf

Attention:
Schools and Libraries Division-Correspondence Unit

Reference:
USAC Invoice number: 869236: Dated 09-April-2008
FRN 1479747- Highlands Elementary School
Duval County School District-
Entity Number: 127591

Subject of Appeal:
Denial of pre-approved amount of \$50,320.01 on FCDL of 10/24/07, when supplemental BEAR (Form 472 number DCPS IC Presidio FY-06-07=corrected 030508) was filed on March 06, 2008

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Summary:
This appeal is to address the denial of payment of \$50,320.01 for FRN 1479747 on the USAC BEAR Notification Letter dated April 09, 2008. The stated reason for the denial was the *"Service Delivery Date was before the Service Start Date"* which is in reference to a date on the Service Provider invoice of 01/29/2007 versus the *Start date* of 02/08/2007.

Based on discussions with the SLD helpdesk on April 15, 2008 (case 21-730852), it was determined our district E-rate group was given inaccurate information during an SLD Helpdesk call on 12/17/2007. The advice given during that call, (case 21-668655) was to file a Form 500 to correct a start date on a previous BEAR Filing back to the July 01, 2006 date listed on the FORM 471.

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Chronology:

The following is a chronological listing of events associated with this appeal (FRN 1479747):

A) May 23, 2006:

Received USAC FCDL for Form 471 application #521703 stating Amount "Not Yet Funded" (see attached). This was a 90% school location. This FCDL had the correct service start date of July 01, 2006.



May 23 2006
FCDL.pdf (318 KB)

B) October 24, 2006

Received USAC FCDL approving a \$50,320.01 rebate based on the correct start date of July 01, 2008



Oct 24 2006 FCDL
approval.pdf ...

C) February 27, 2007:

Received a Form 486 reminder letter to file the Form 486 for FRN 1479747

D) June 06, 2007:

Our E-rate group filed a paper Form 486 using an incorrect start date of 02/08/2007, instead of the July 01, 2006 date from the Form 471. **Note:** The exact reason for using this incorrect date is not known.. At that point, in time DCPS E-rate administrator duties were in transition to the current E-rate management team, which was contributory to not realizing the error.



June 6 2006 Form
486 filing.pd...

E) June 27, 2007

Received Form 486 Notification Letter Funding Commitment Report. This report included the incorrectly entered start date of 02/08/2007; however, we failed to recognize the error.



USAC Form 486
Notification let...

F) September 20, 2007

Sent BEAR (Form 472-DCPS IC Presidio FY 06-07) to the service provider for signature approval. This FRN was included along with 10 additional FRN's. (See attached)

G) October 11, 2007

Sent Formal BEAR (Form 472 DCPS IC Presidio FY 06-07) to SLD in Lawrence Kansas for re-imbursement.



FORM 472
ling-OCT 11 2007.p.

H) November 16, 2007:

The form 472 (BEAR) Notification letter dated November 16, 2007, funded only three of the eleven FRNs listed on the October 11, 2007 BEAR. The reason for the Funding denial of the eight FRNs was "Service Delivered before 486 Service Start Date." FRN 1479747 was included among those denials.



Form 472 Nov 16
2007 USAC LTR....

I) December 17, 2007:

Called SLD Helpdesk (case 21-668655) to review several items on different case numbers, plus request advice regarding action on the funding denials in the November 16, 2007 notification. The helpdesk agent advised filing a consolidated Form 500 listing the eight FRN denials from the November notice. The Helpdesk advised that each of the FRNs be listed as a separate Page-2 on the FORM 500.

J) December 19, 2007:

Mailed FORM 500 to SLD FORM 500, Lawrence Kansas. The form 500 had a Page-2 listing for each denied FRN requesting Start Date change from 02/08/2007, back to the July 01, 2006 Start Date listed on the Form 471 filing.



Form 500 Dec.19,
2007.pdf (88 ...

K) January 10, 2008:

Received USAC Form 500 Notification Letter changing the start dates for all eight denied FRNs to a February 2007 start date instead of the requested July 01, 2006 Start Date. This was interpreted as direction/approval to use these February 2007 start dates for FORM 472 filing purposes.



Form 500 USAC
Jan 10, 2008not...

L) January 25, 2008:

Re-filed an updated BEAR (Form 472-DCPS-IC Presidio FY 06-07 Form 500 *supplem*) for the denied FRN's using the start date information given in the January 10, 2008 Form 500 Notice. The assumption was that since all the start dates had been changed to February 2007 by USAC, we needed to use those date

instead of the requested July 2006 date. The form was sent via Certified US Mail services.



FORM 472
lling-Jan.25 2008.p..

M) February 12, 2008:

Called SLD Helpdesk to follow-up on status of BEAR form submitted January 25, 2008 (case 21-698813). we were notified that the eight FRNs on the 01/25/2008 BEAR Form were denied again based on the fact that the BEAR form had postmark of 01/29/08 date which exceeded the deadline date of 01/28/08 by one day. The SLD agent advised to file an Invoice Deadline Extension Request for this BEAR filing.



Invoice deadline
ext ltr. Feb....

N) February 13, 2008:

An Invoice Deadline Extension request form was completed and sent via certified mail on February 14, 2008 to the *Schools and Libraries Division-Correspondence Unit*, as advised under case 21- 698813. Also, the official USAC Form 472 Notification Letter indicating the FRN funding denial was received this date. This notice listed the denial reason as the late USPS postmark discussed in case 21698813.

O) March 04, 2008:

Status call made to the SLD Helpdesk and spoke with Carol regarding the Invoice Deadline Extension request (case # 21-698813) mailed February 14, 2008. Per the SLD helpdesk agent, the invoice dates were extended until July 1, 2008 and all FRNs were cleared for an updated BEAR Form to be filed.

P) March 6, 2008:

Based on the 03/04/2008 SLD Helpdesk feedback, an updated BEAR (Form 472-DCPS-IC-Presidio Fy06 07=corrected 03052008) was sent via certified mail to the SLD Form 472 group. This updated BEAR form included all FRN corrections supplied from all of the SLD helpdesk calls and USAC notices.



Form 472 filing
march 6 2008.p...

Q) March 20, 2008:

Notice received from the *Schools and Libraries Division-Invoicing group*, requesting copies of the Service provider invoices indicating bill/ship dates, Service Provider name, Total charges, Bill to entity, etc. with a March 27, 2008 deadline



March 25 2008
response to USAC...

R) March 25, 2008:

Email sent to the SLD Invoicing reviewer, Warren Nuss, with an itemized Excel Spreadsheet summarizing all requested information by FRN, and an adobe PDF file of each service provider invoice per FRN.



March 25 2008
response to USAC...

S) March 26, 2008:

A paper copy of all the information request by FRN in the March 20 USAC letter and the March 25 email was sent via FED-EX to the *Schools and Libraries Division-Invoicing group* c/o Warren Nuss for next day delivery.

T) April 09, 2008:

Received a Form 500 (BEAR) Notification letter, USAC invoice number 869236, approving funding for seven of the eight previously denied FRN's (total \$280,368.76 vs. the requested \$329,707.34). FRN 1479747 was denied as "*Service delivered before 486 Service Start Date*". Based on discussion during SLD helpdesk case #21-730852, the denial may have been due to the Service Provider invoice date of 01/29/2008 versus the incorrect start date of 02/08/2008. Thus, had the Start date been changed back to July 1, 2006, as requested in our Form 500 filing to match the Form 471 filing, this FRN would not have been denied.

Conclusion:

Our request is to reverse the January 10, 2008 funding denial and reinstated the funding for this FRN based on the following:

- 1) During a Duval County School District E-rate management team transition In June 2007, our new E-rate management team mistakenly entered the wrong Start date for FRN 1479747 in our Form 486 filing.
- 2) Once the error was discovered, we were given incorrect SLD helpdesk advice on 12/17/207 (case #21- 668655) to file a form 500 to correct the start issue instead of filing a formal appeal.
- 3) The total Invoice amounts for the Service provider under this FRN were \$56,748.00 which would equate to \$51,073.20 instead the \$50, 320.01 requested in the initial Form 471 filing. Nonetheless, we are requesting only an additional \$49,105.01 be reimbursed, given \$1215.00 was paid against this FRN in the January 10, 2008 notice.

4) With our district submitting multiple Form 472 filings for these FRN's, our E-rate group assumed all of the FRN's had been cleared for approval until the FRN denial notice of April 9, 2008.

Based on our districts' good faith effort to provide the required documentation and to correct our known errors in a timely manner, we respectfully request funding for this FRN be re-instated.

Sincerely,

William M. (Mike) Kirkland

William M. (Mike) Kirkland
Supervisor-Telecommunications
Duval County Public School System
Office: 904-348-7151
Fax: 904-348-7125
office desktop fax: 904-858-3565
Mobile service: 904-962-7882
DCPS email: kirklandw@duvalschools.org